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I. Introduction

The United States Environmental Protection Agency (EPA) and Alaska Department of Environmental Conservation (ADEC) inspected ConocoPhillips Alaska, Inc. (CPAI), Central Production Facility #1 (CPF#1) (or the "facility") to verify compliance with applicable State and federal regulations under the Clean Air Act (CAA). On July 2, 2019, the EPA notified the facility by phone and email of the CAA inspection to be conducted on July 18, 2019. This email is attached to this report (Attachment 1). The inspection was focused on compliance with New Source Performance Standards (NSPS) Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015. CPF#1 is an existing facility which became subject to the rule when it was modified or reconstructed after September 18, 2015.

A. Summary of the Facility

CPAI, CPF#1 is an oil and gas production facility in the Kuparuk River Unit, on the North Slope of Alaska. The SIC code for this facility is 1311, Crude Petroleum and Natural Gas Production. The NAICS code of this facility is 211111, Crude Petroleum and Natural Gas Extraction. CPF#1 has a processing pad which processes crude oil production fluids received from Well Pads.

Production fluids from wells are processed to remove hydrocarbon gas and water from crude oil. Hydrocarbon gas is dehydrated and compressed for reinjection into the reservoir or used as fuel. Water is processed to remove oil before injection into disposal or injector wells. Crude oil is sent from the CPF#1 production pad via pipeline to the Trans Alaska Pipeline which then ships all oil from the Kuparuk field and other fields to Valdez, Alaska. According to the Title V permit Statement of Basis, the facility is a major source for five criteria pollutants: nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM-10), sulfur dioxide (SO₂) and volatile

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